



FEDERAL ELECTION COMMISSION
Washington, DC 20463

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2 **TO:** The Commission
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4 **FROM:** Lisa J. Stevenson *LJS/kmg*
5 Acting General Counsel
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7 Kathleen M. Guith *kmg*
8 Associate General Counsel
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10 Jin Lee *JL*
11 Acting Assistant General Counsel
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13 Ana J. Peña-Wallace *APW*
14 Attorney
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16 **RE:** MUR 6860 (Terri Lynn Land, *et al.*)
17 Proposed Probable Cause Conciliation Agreement
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20 Attached is a proposed conciliation agreement for probable cause conciliation with
21 Respondents Dan Hibma, Terri Lynn Land, and Terri Lynn Land for Senate and Kathy Vosburg
22 in her official capacity as treasurer (the "Committee").
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24 The proposed
25 agreement is for the Commission's consideration along with the Office of General Counsel's
26 Notice to the Commission Following the Submission of Probable Cause Brief in MUR 6860
27 ("OGC Notice"), which is being submitted to the Commission simultaneously with this
28 Memorandum. The OGC Notice informs the Commission that this Office intends to proceed
29 with the recommendation that the Commission find probable cause to believe that Dan Hibma
30 violated 52 U.S.C. § 30116(a)(1)(A), that Terri Lynn Land and the Committee violated
31 52 U.S.C. § 30116(f), and that the Committee violated 52 U.S.C. § 30104(b)(3)(A).¹
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¹ The Commission previously found reason to believe that Dan Hibma violated 52 U.S.C. § 30116(a)(1)(A), that Terri Lynn Land and the Committee violated 52 U.S.C. § 30116(f), and that the Committee violated 52 U.S.C. § 30104(b)(3)(A). See MUR 6860, Certification ¶ 2 (June 17, 2016).

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RECOMMENDATIONS

- 2. Approve the appropriate letter.**